



PRIOR APPROVAL POLICY

Policy 4.12

Responsible
Executive: Doug
Knerr

Originally Issued:
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Revised:

Effective date:
December, 18, 2013

Policy Statement

It is the policy of Roosevelt University (RU, “the University”) that all costs proposed or incurred on a sponsored project comply with all terms and conditions and University policies and procedures, including those associated with obtaining prior approval for changes in a sponsored project, and the exercise of authority over such changes when necessary.

Reason for Policy

The purpose of this policy is to assist Project Director’s (PD’s) Principal Investigators (PI’s), colleges, departments, units and personnel of the University to effectively manage the finances of sponsored program awards by providing guidelines and procedures for attaining prior approvals when applicable.

Entities Affected by this Policy

This policy is applicable to all colleges, departments, units, and personnel of the University involved in administering sponsored awards.

Web Address

To be completed by the President’s Chief of Staff.

Implementation

University Internal Prior Approval System (PAS) and Expanded Authorities for the Management of Federal Grants

A PI may report deviations from budget and program plans and request prior approvals from the Office of Research and Sponsored Programs (ORSP) for the following:

Pre-Award Costs

To create a sponsored project for the purpose of incurring pre-award costs up to a maximum of 90 calendar days prior to award start date. However, expenditures prior to the award start date are solely at the financial risk of the department. See RU's pre-award expenditure policy for additional details.

No-Cost Extension

To initiate a one-time extension of the award expiration date of up to 12 months. The funding sponsor must be notified of the extension at least ten days prior to the original termination date. This extension may not be exercised solely for the purpose of using any unobligated balance.

Adding Scientific or Special Purpose Equipment

To re-budget funds for the purchase of scientific or special-purpose equipment not identified in the original sponsor approved budget, general-purpose equipment is not allowable unless used solely or primarily for the objectives of the sponsored project and if the cost supports the activity that is directly related to the special purpose or circumstance of the sponsored agreement.

Approval Required from the Sponsoring Agency

The PD of a Federally-sponsored project, in accordance with OMB Circular A-110, RU establishes the following expectation is required to report major deviations as outlined below from budget and program plans. The PI should work with Research and Sponsored Programs, following the Prior Approval Request (PAR) procedures, to request prior approvals directly from Federal awarding agencies for any of the following program or budget-related reasons:

Change in the scope or the objectives of the project or program.

Change in the PD and/or key personnel (the definition of key personnel may vary by sponsoring agency) or in project effort (absence for more than three months or a 25% reduction in time devoted to the project).

Transfer of funds allotted for trainee expenses (direct payment to trainees: stipend, tuition, fees) to other categories of expense.

Subawards, transfers or subcontracting a substantive portion of work, unless described in the application and funded in the approved award.

Budgeting of pre-award costs to be incurred more than 90 days prior to award.

Other expenses, if not waived by a particular agency in the notice of award (i.e., foreign travel, carry forward of funds from one budget period to the next, re-budgeting of trainee allowances or participant costs, alterations and renovations in excess of \$25,000, adjustment of cost sharing commitment).

Making a Request a Prior Approval System

Internal prior approvals will be made on a Prior Approval Request form.

Approval for any changes must be received prior to implementing those changes. Generally, requests for approval of changes that have already occurred will be reviewed but cannot be approved by Research and Sponsored Programs.

A no-cost extension must be approved in advance of the original date of project termination to allow adequate time for sponsor notification. Typically a first no-cost extension is required to be submitted 10 days in advance of the project end date. A second no-cost extension is normally requires submission with 10

Research and Sponsored Programs should be consulted in advance of submitting the PAR.

The signatures of the PI, Department Chair or Unit leadership and ORSP are required to complete the PAR approval.

PI's should complete and sign the attached forms before securing the signatures of the Department Chair or Unit leadership. The request is then submitted to Research and Sponsored Programs for final approval.

Each request must include a well-detailed justification explaining the reason for a deviation from the original, approved budget and/or work plan.

Each request will be reviewed for appropriateness in relation to the objectives of the project and for compliance with the regulations, policies and procedures of both the University and the sponsor.

Once a PAR request has been approved, Grants Accounting will be notified and the appropriate changes will be reflected in the project's budget detail, which is available to the PI and/or their designee.

PI's should refer to specific terms and conditions from the awarding sponsor for details on budget restrictions and/or post-award changes.

Making a Request to the Awarding Sponsor Agency

Changes which require approval from the awarding sponsor should be described in an email from the PI to the appropriate sponsor official. Research and Sponsored Programs will review each request. The letter must be approved/ signed by both the PI and the Director of Research and Sponsored Programs. Once the letter has been approved, Research and Sponsored Programs will forward the request to the sponsor. In lieu of a signed letter, many agencies will now accept an email from Research and Sponsored Programs or may have an electronic interface for the submission of such requests.

Online Resources and Forms

OMB [Circulars A-21,A-110](#)